

EXHIBIT A

AUG 09 2005

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORIGINAL

ASHLEY ADAMS	:	
716 North Barrett Lane	:	
Christiana, DE 19702	:	
	:	
Plaintiff,	:	No. 04-251 JJF
	:	
v.	:	NON-ARBITRATION CASE
	:	
JO ELLEN CHAPEN SHELDON	:	JURY TRIAL DEMANDED
708 Pebble Beach Drive	:	
Elkton, MD 21921	:	
	:	
Defendant.	:	

Deposition of **ASHLEY ADAMS**, taken pursuant to notice, before CAROL DiSERAFINO, Professional Reporter and Notary Public, duly authorized to administer oaths, on **WEDNESDAY, JULY 6, 2005, at 3:35 p.m.**, held at the offices of Casarino Christman & Shalk, P.A., 800 North King Street, Suite 200, Wilmington, Delaware. There being present:

APPEARANCES:

CHARLES S. COOPER, ESQ.

COOPER & SCHALL, P.A.
1760 Market Street, Ste. 1100
Philadelphia, Pennsylvania 19103
Attorney for Plaintiff

BETH H. CHRISTMAN, ESQ.

CASARINO CHRISTMAN & SHALK, P.A.
800 North King Street, Ste. 200
Wilmington, Delaware 19899
Attorney for Defendant

1 done before you start speaking because the Court
2 Reporter can only take down one of us at a time; all
3 right?

4 A. Okay.

5 Q. Let me start by just asking you a few
6 background questions. First of all, state your full
7 name for the record.

8 A. Ashley Adams.

9 Q. Do you have a middle name?

10 A. Taylor.

11 Q. And have you ever been known by any name
12 other than Ashley Taylor Adams?

13 A. Um, birth name.

14 Q. What was that?

15 A. Johnson.

16 Q. Ashley Taylor Johnson?

17 A. Yes.

18 Q. And how long were you known by the name
19 of Ashley Johnson?

20 A. Probably 20 years?

21 Q. I'm sorry. Twenty or 28?

22 A. Twenty.

23 Q. Did you get married when you were 20
24 years old?

1 A. No.

2 Q. Have you used any other first name
3 besides Ashley?

4 A. No.

5 Q. And how many places would you say you've
6 lived in the past ten years? How many addresses?

7 A. The last ten years?

8 Q. Yes.

9 A. Probably three.

10 Q. And give me those addresses.

11 A. The most current going back?

12 Q. Yes.

13 A. That's 716 North Barrett Lane.

14 Q. Where is that located?

15 A. Newark, Delaware.

16 Q. Is that where you currently reside?

17 A. Right. That's correct.

18 Q. And do you live with anyone there?

19 A. No.

20 Q. And how long have you lived there?

21 A. Three years, approximately.

22 Q. Where did you live before that?

23 A. 186 Independence Drive.

24 Q. In what city?

1 MR. COOPER: You know what we could do?
2 We could probably produce her tax returns and then I
3 think that's going to give you a good -- you can
4 certainly ask her. I think if you get the tax returns
5 you're going to know. There's a wage loss claim here,
6 so you'll get the tax returns.

7 MS. CHRISTMAN: I don't have any Rule 26
8 disclosure, so I'm asking these questions.

9 MR. COOPER: I understand; I understand.
10 BY MS. CHRISTMAN:

11 Q. Let me ask: Do you remember even one
12 place you worked while you were going to Wilmington
13 College?

14 A. Can we just go to the next question
15 because I really can't recall the two together, where
16 I was working and going to school at the same time.

17 Q. After you got done with Wilmington
18 College and got your degree do you remember where you
19 worked?

20 A. I was working at Delaware Park.

21 Q. And what did you do there?

22 A. Internal auditor.

23 Q. And how long did you work there?

24 A. Less than a year.

1 A. Accountant.

2 Q. And where was that located?

3 A. Wilmington, Delaware.

4 Q. And why did you leave that job?

5 A. For what I thought was a better
6 opportunity.

7 Q. Was that the Bank of New York job?

8 A. Yes.

9 Q. Before 2002 did you have a family
10 doctor?

11 A. I don't know the answer to that. I'm
12 sure I did but I don't --

13 Q. When you lived in Rising Sun, Maryland,
14 who was your family doctor?

15 A. I don't recall having a specific family
16 doctor.

17 Q. What would you do if you needed any
18 medical assistance?

19 A. I guess it was on rare occasion that I
20 would see a physician, but I don't really recall.

21 Q. Do you remember having a gynecologist
22 when you lived in Rising Sun?

23 A. I don't remember who it would be.

24 Q. When you lived in Elkton did you have a

1 family doctor?

2 A. Again, I just don't remember who it
3 would be.

4 Q. Do you ever remember going to the doctor
5 when you were living in Elkton?

6 A. I mean, I'm sure there probably was an
7 occasion where I've seen a doctor for something but I
8 just don't recall it to be anything significant.

9 Q. So you can't remember any doctor you saw
10 at any time before 2002?

11 A. Not right now I can't, no.

12 Q. And how old are you now?

13 A. 52.

14 Q. Do you remember ever having to take any
15 prescription medication before 2002?

16 A. Not specifically.

17 Q. Did you ever go to a pharmacy before
18 2002 to have prescriptions filled?

19 A. I probably did have some but I don't
20 know what that would be right now.

21 Q. Did you ever go to any pharmacy in
22 Rising Sun, Maryland?

23 A. Probably, but I don't remember what it
24 would be.

1 Q. Do you have any memory as to what drug
2 stores there were in Rising Sun where you would have
3 gone?

4 A. I don't think there's too many drug
5 stores in Rising Sun.

6 Q. Did you ever go to a drug store in
7 Elkton when you were living in Elkton to get a
8 prescription filled?

9 A. I believe so.

10 Q. And where would you have gone in Elkton?

11 A. I don't remember.

12 Q. Do you remember at this point what
13 pharmacies there are in the Elkton area?

14 A. There's quite a few I believe.

15 Q. Before 2002 did you ever take Percocet?

16 A. I don't remember.

17 Q. Do you remember taking any kind of
18 narcotic medication before 2002?

19 A. I don't know.

20 Q. Before 2002 were you ever involved in
21 any motor vehicle accidents?

22 A. Before the year 2002?

23 Q. Correct.

24 A. Yes.

1 car accident that you've just discussed with me?

2 A. Other than the car? I don't think so.

3 Q. Have you ever made any claim for
4 worker's compensation benefits?

5 A. Not that I recall.

6 Q. Did you ever slip and fall in the
7 supermarket?

8 A. Yes, I did.

9 Q. And were you hurt when you fell?

10 A. That was my knees were hurt.

11 Q. And who treated you for that?

12 A. I went to the local emergency room and I
13 believe that was pretty much it.

14 Q. And which local emergency room would
15 that have been?

16 A. The Cecil County Hospital.

17 Q. Have you ever been to Union Hospital?

18 A. That's the same.

19 Q. Besides Union Hospital and Christiana
20 Hospital have you ever been to any other hospitals for
21 medical treatment?

22 A. I don't think so.

23 Q. Did you have a lawsuit or a claim as a
24 result of falling in the supermarket?

1 A. Um, I think there was not a lawsuit.

2 Q. Did you make a claim?

3 A. There was a claim.

4 Q. And did you recover as a result of that
5 claim?

6 A. It was a nominal amount of money.

7 Q. And what do you consider nominal?

8 A. Say, a thousand dollars?

9 Q. Were you represented by an attorney for
10 that?

11 A. I don't remember.

12 Q. Did Mort Kimmel ever represent you?

13 A. I don't know who that is.

14 Q. Were you ever represented by anybody
15 from Kimmel Carter Roman & Peltz?

16 A. Could you repeat that.

17 Q. Were you ever represented by an attorney
18 from Kimmel Carter Roman & Peltz?

19 A. I don't know who they are.

20 Q. Since the accident in April of 2002 have
21 you been in any motor vehicle accidents?

22 A. Could you repeat that.

23 Q. Since the accident in April of 2002
24 which involved Miss Sheldon for which we're here today

1 Q. Had you ever seen First State or anyone
2 with that facility before the February, 2002 accident?

3 A. No.

4 Q. How did you get to that facility for
5 treatment? Who referred you there?

6 A. I don't think anybody referred me there.
7 I think I got them from the phone book.

8 Q. Did you go to the emergency room after
9 the February, 2002 accident?

10 A. No.

11 Q. Was there a police report as a result of
12 that accident?

13 A. No.

14 Q. Why was there no police report?

15 A. Because it was insignificant.

16 Q. And have you made any claim as a result
17 of that accident?

18 A. No.

19 Q. Did you have an attorney representing
20 you because of that accident?

21 A. I spoke with an attorney, but nothing --

22 MR. COOPER: Don't repeat what you said
23 to the attorney.

24 - - -

1 already finished.

2 Q. And do you remember having any problems
3 with your activity level in the few weeks before the
4 April, 2002 accident?

5 A. I had no problems with any activity.

6 Q. Were you having any health problems
7 before 2002 that affected your ability to engage in
8 your normal activities, say, in the five years before
9 2002?

10 A. Five years before 2002? I was very
11 active. I had no problems.

12 Q. And before April of 2002 had you ever
13 been diagnosed with any psychological or psychiatric
14 problem?

15 A. No.

16 Q. And since then have you been diagnosed
17 with any psychological or psychiatric problems?

18 A. No.

19 Q. And have you ever treated with a
20 psychologist or psychiatrist?

21 A. Not that I recall.

22 Q. Before April of 2002 were you ever
23 convicted of any crime?

24 A. No.

1 Q. Since April of 2002 have you been
2 convicted of any crime?

3 A. No.

4 Q. Have you ever pled guilty to any crime
5 involving falsehood or dishonesty at any time in your
6 life?

7 A. No.

8 Q. Do you know anybody by the name of Doris
9 Adams?

10 A. Yes.

11 Q. And is she related to you in any way?

12 A. That was one of my names.

13 Q. Explain that to me.

14 A. That's part of my name.

15 Q. Doris is part of your name?

16 A. Uh-huh.

17 Q. Explain to me how Doris is part of your
18 name.

19 A. It's the name I went by.

20 Q. I'd asked you --

21 A. Birth name.

22 Q. You had told me that your name was
23 Ashley Taylor Adams or Ashley Taylor Johnson. Where
24 does the Doris fit in?

1 A. That was part of my name, my given name.

2 Q. What was your given name then?

3 A. (No response).

4 Q. Tell me, was it Ashley Doris or Doris
5 Ashley?

6 A. Doris Ashley.

7 Q. So your given name was actually Doris
8 Ashley. Was Taylor in there, too?

9 A. (Witness moves head up and down).

10 Q. Yes? I need a yes or a no.

11 A. Oh. Yes.

12 Q. Taylor Johnson. Was that your first
13 name, birth name?

14 A. Johnson is the last name.

15 Q. So Doris Ashley Taylor Johnson was your
16 birth name?

17 A. Yes.

18 Q. And then -- so do you also sometimes go
19 by the name Doris Adams?

20 A. No.

21 Q. Do you know of anybody else who uses the
22 name Doris Adams?

23 A. Wait a minute. Do I currently go by
24 that name?

1 Q. Have you ever gone by the name Doris
2 Adams?

3 A. I did. Yes.

4 Q. And when did you go by the name Doris
5 Adams?

6 A. What years?

7 Q. Yes.

8 A. I guess somewhere in the '70s.

9 Q. And when you were going by the name of
10 Doris Adams were you ever convicted of any crime?

11 A. No. Never been convicted of any crime.

12 Q. Let's talk a little bit about the
13 incident on April 23, 2002. What vehicle were you
14 driving?

15 A. A Honda Civic.

16 Q. Did you own that Honda Civic?

17 A. Could you repeat that.

18 Q. Did you own the Honda Civic you were
19 driving on April 23, 2002?

20 A. Yes.

21 Q. And how long did you own that vehicle?
22 Do you remember?

23 A. Probably three years.

24 Q. Did you buy it new or used?